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LETTER FROM U S EPA REGION IV FINDING CORRECTIVE MEASURES STUDY FOR  
SOLID WASTE MANAGEMENT UNIT 39 AND TREATABILITY STUDY FOR SOLID WASTE  
MANAGEMENT UNIT 14 AND TRANSMITTING COMMENTS ON TREATABILITY STUDY FOR  
SOLID WASTE MANAGEMENT UNIT 39 MILLINGTON SUPP

1/28/2002  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GA 30303-8960

January 28, 2002

4WD/FFB

Commanding Officer  
Attn: Jim Reed  
Code 1872  
SOUTHNAVFACENGCOM  
2155 Eagle Drive  
North Charleston, South Carolina 29419-9010

Subject: Corrective Measures Study Work Plan SWMU 39 Soil and Groundwater, Revision: 2, Monitored Natural Attenuation Treatability Study Work Plan SWMU 14, Revision 1, and Monitored Natural Attenuation Treatability Study Work Plan SWMU 39, Naval Support Activity Mid-South, Millington, Tennessee.

Dear Mr. Reed,

The Environmental Protection Agency (EPA) has completed review of the subject documents. EPA's comments for SWMU 39 Corrective Measures Study and SWMU 14 Treatability Study have been adequately addressed. Comments are provided on the Treatability Study for SWMU 39. Please find enclosed EPA's comments on the report.

If you would like to discuss these comments or have questions please contact me at 404-562-8513.

Sincerely,

A handwritten signature in cursive script, reading "Jennifer Herndon", is written over a horizontal line.

Jennifer Herndon  
Remedial Project Manager

cc: ~~Rob Williamson, Public Works Office~~  
Jim Morrison, TDEC - Memphis  
Clayton Bullington, TDEC - Nashville  
John Stedman, Ensaf - TOM  
Jack Carmichael, USGS

**Monitored Natural Attenuation Treatability Study Work Plan SWMU 39**  
**Naval Support Activity Mid-South, Millington, Tennessee**

Specific Comments

Well locations for monitoring natural attenuation are described in Section 3 and are illustrated in Figure 4. The last sampling event was conducted in October 2000. Before monitoring wells are installed, another round of samples should be collected to confirm extent of contamination and optimize locations for new wells. It is possible that depending on the concentrations in wells 039G06LF and 039G07LF monitoring wells should be installed downgradient of these wells.

Well 039G09LF contained 487.0 ug/L of extractable petroleum hydrocarbons. What compounds make up the extractable petroleum hydrocarbons? A monitoring well may be necessary downgradient of this well.

The depth of the proposed monitoring wells and well construction (screen length) should be provided. Given the thickness of the contaminated zone (90 feet) consideration should be given to installing nested wells that monitor the mid and basal portion of the Fluvial Aquifer.

No wells are proposed to monitor the lateral extent of contamination. A monitoring well should be installed north of 039G03LF to monitor/define the lateral extent of the plume.